

Judge Pauley,

BLANK ROME LLP
Attorneys for Plaintiff
Jeremy J.O. Harwood
405 Lexington Avenue
The Chrysler Building
New York, NY 10174
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE STEAMSHIP MUTUAL
UNDERWRITING ASSOCIATION
(BERMUDA) LIMITED,

Plaintiff,

v.

PT PUPUK SRIWIJAYA,

Defendant.

09 CV 7371



09 Civ.

VERIFIED COMPLAINT

Plaintiff THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION (BERMUDA) LIMITED ("Plaintiff"), by its attorneys Blank Rome LLP, complaining of the above-named Defendant PT PUPUK SRIWIJAYA ("Defendant"), alleges upon information and belief as follows:

1. This is a case of admiralty and maritime jurisdiction, as hereinafter more fully appears, and is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. The Court has subject matter jurisdiction. The action is also brought pursuant to 9 U.S.C. § 8.

2. At all material times, Plaintiff was and now is a foreign company organized and existing under the laws of Bermuda.

3. At all material times, Defendant was and now is a corporation organized and existing under the laws of Indonesia.

THE BASIC FACTS

4. Plaintiff entered into a contract of marine protection and indemnity insurance with Defendant for its Vessels (the "Policy").

5. Plaintiff issued its invoices for insurance of Defendant's Vessels, attached as Exhibit 1 to the accompanying Rule B affidavit ("Aff.") as summarized in Exhibits 2 and 3 to the accompanying Rule B affidavit, for \$275,990.

6. Despite repeated request Defendant has refused to pay the sums that it owes.

7. The Policy is subject to English law and London arbitration. Plaintiff has or shortly will demand arbitration. This action is expressly filed without prejudice to that right of arbitration.

COUNT I

RULE B RELIEF

8. Plaintiff repeats paragraphs 1 through 7 as if fully set forth herein.

9. Plaintiff seeks issuance of process of maritime attachment so that it may obtain security for its claims including its English attorneys' fees and arbitrators' fees which are routinely awarded in London arbitration and no security for Plaintiff's claim has been posted by Defendant or anyone acting on its behalf to date.

10. At best as can now be estimated, Plaintiff expects to recover the following amounts in the arbitration:

A. On the principal claim	\$191,517
B. Estimated Recoverable English Lawyers and Arbitrators' Fees & "Costs"	\$ 50,000
C. Interest over the course of 3 years at prime rate average of 8% per annum:	<u>\$ 34,473</u>
TOTAL:	\$275,990

11. Defendant cannot be found within this district within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure ("Rule B"), but is believed to have, or will have during the pendency of this action, assets in this jurisdiction consisting of cash, funds, freight, hire, and/or credits in the hands of garnishees in this District, including but not limited to electronic fund transfers and/or CHIPS credits, because Defendant conducts business internationally in U.S. Dollars, and all electronic fund transfers are processed by intermediary banks in the United States, primarily in New York.

12. Plaintiff's belief that Defendant's property may be found in this District is based on the fact that Defendant has previously made payments to Plaintiff in U.S. dollars, as evidenced by a wire transfer made under the Charter.

13. The named garnishee banks participate in the CHIPS system in New York to send U.S. dollar wire transfers between banks in the United States and through the world.

14. Accordingly, Plaintiff believes that some assets of Defendant in U.S. dollars EFTs will be transferred through intermediary CHIPS banks, including the named garnishee banks.

WHEREFORE, Plaintiff prays:

A. That process in due form of law issue against Defendant, citing it to appear and answer under oath all and singular the matters alleged in the Verified Complaint;

B. That since Defendant cannot be found within this District pursuant to Rule B, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B attaching all of Defendant's tangible or intangible property or any other funds held by any garnishee, which are due and owing to Defendant up to the amount of \$275,990 to secure the Plaintiff's claims, and that all persons claiming any interest in the same be cited to appear and, pursuant to Rule B, answer the matters alleged in the Verified Complaint;

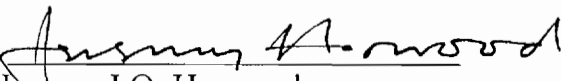
C. That since it appears that the U.S. Marshal's Service lacks sufficient staff to effect service of process of Maritime Attachment and Garnishment promptly or economically, and that since appointing a person over 18 years of age and who is not a party to this action will result in substantial economies in time and expense, such a person be appointed pursuant to Fed.R.Civ.P. 4(c) to serve process of Maritime Attachment and Garnishment in this action.

D. That this Court retain jurisdiction over this matter through the entry of a judgment or award associated with the pending claims including appeals thereof.

E. That Plaintiff may have such other, further and different relief as may be just and proper.

Dated: New York, NY
August 20, 2009

Respectfully submitted,
BLANK ROME LLP
Attorneys for Plaintiff

By 
Jeremy J.O. Harwood
405 Lexington Avenue
New York, NY 10174
Tel.: (212) 885-5000

VERIFICATION

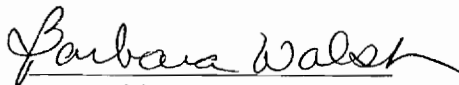
STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

Jeremy J.O. Harwood, being duly sworn, deposes and says:

1. I am a member of the bar of this Honorable Court and of the firm of Blank Rome LLP, attorneys for Plaintiff.
2. I have read the foregoing Complaint and I believe the contents thereof are true.
3. The reason this Verification is made by deponent and not by Plaintiff is that Plaintiff is a foreign corporation, no officer or director of which is within this jurisdiction.
4. The sources of my information and belief are documents provided to me and statements made to me by representatives of Plaintiff.


Jeremy J.O. Harwood

Sworn to before me this
20th day of August, 2009


Notary Public

BARBARA WALSH
Notary Public, State of New York
No. 01WA4925486
Qualified in Queens County
Commission Expires August 15, 2010

BLANK ROME LLP
Attorneys for Plaintiff
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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(BERMUDA) LIMITED,

Plaintiff,

v.

PT PUPUK SRIWIJAYA,

Defendant.

09 Civ.

**AFFIDAVIT UNDER
SUPPLEMENTAL RULE B**

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

JEREMY J.O. HARWOOD, being duly sworn, deposes and says:

1. I am a member of the Bar of this Honorable Court and a member of the firm of Blank Rome LLP, attorneys for the Plaintiff herein. I am familiar with the circumstances of the complaint and submit this affidavit in support of Plaintiff's request for the issuance of process of maritime attachment and garnishment of the property of defendant PT PUPUK SRIWIJAYA, a company organized and existing under the laws of

Indonesia, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

2. The defendant is not incorporated or registered to do business in this State.

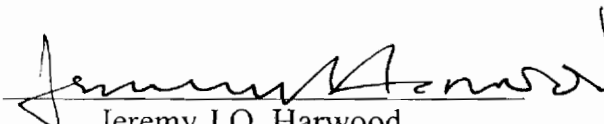
3. Under my supervision, my office did an on-line search of the New York State Secretary of State, Division of Corporations and Transportation Tickler, telephone assistance in New York City and the internet Yellow Pages.

4. In our search, we did not find any listing or reference to defendant in this district or state.

5. In the circumstances, I believe the defendant cannot be "found" within this district.

6. I attach as Exhibit 1 hereto a copy of the Plaintiff's invoices for premiums owing dated February 9, 2009.

7. I attach as Exhibit 2 and 3 hereto a copy of the Plaintiff's summaries of statements of account owing as of August 20, 2009.


Jeremy J.O. Harwood

Sworn to before me this
20th day of August, 2009


Notary Public

BARBARA WALSH
Notary Public, State of New York
No. 01WA4925486
Qualified in Queens County
Commission Expires August 15, 2010

EXHIBIT 1



STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Swinglehurst Ltd

Account No: 36223

Note No: BD/42800/AU
Date Issued: 01-Feb-2009
Policy Year: 2005

CERTIFICATE NO: BD00091766

Vessel: JOELIANTO MOELJODIHARDJO

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2005 To N. 20-Feb-2006

To release the vessel from further calls
US\$ 24,619.57 x 25%

Amount(s) due on

01-Feb-2009 Release Calls

US\$ 6,154.89

Total Mutual Premium

US\$ 6,154.89

**ALL OUTSTANDING INSTALMENTS ARE NOW DUE
IMMEDIATELY IN ACCORDANCE WITH THE RULES
OF THE ASSOCIATION.**

Please arrange settlement to:
THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION (BERMUDA) LIMITED
Authorised and regulated by the Bermuda Monetary Authority and the United Kingdom Financial Services Authority
Account Number: 8900111550, SWIFT Address: IRVTUS3N, CHIPS UID: 001, ABA: 021000018
The Bank of New York Mellon, One Wall Street, NYC, NY10286
Under advice to the Managers' London Representative:
Steamship Insurance Management Services Limited, Aquatical House, 39 Bell Lane, London, E1 7LU
Telephone: +44 20 7247 5490



STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42897/AU

Date Issued: 05-Feb-2009
Policy Year: 2006

CERTIFICATE NO: BD00015721

Vessel: SULTAN MAHMUD BADARUDDIN II

Class 1 P&I
Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

vessel to be released from further call
US\$ 24,005.52 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,001.38

Total Mutual Premium

US\$ 6,001.38

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INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42899/AU

Date Issued: 05-Feb-2009

Policy Year: 2006

CERTIFICATE NO: BD00015724

Vessel: OTONG KOSASIH

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

To release the vessel from further call

US\$ 25,432.27 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,358.07

Total Mutual Premium

US\$ 6,358.07

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INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42901/AU

Date Issued: 05-Feb-2009

Policy Year: 2006

CERTIFICATE NO: BD00015725

Vessel: IBRAHIM ZAHIER

Class 1 P&I

Std P&I ex Cargo, Crew, Collision 1/4th, F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

To release the vessel from further call

US\$ 25,432.27 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,358.07

Total Mutual Premium

US\$ 6,358.07

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INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42903/AU

Date Issued: 05-Feb-2009

Policy Year: 2006

CERTIFICATE NO: BD00015726

Vessel: SOEMANTRI BRODJONEGORO

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

To release the vessel from further call

US\$ 25,432.27 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,358.07

Total Mutual Premium

US\$ 6,358.07

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INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42905/AU

Date Issued: 05-Feb-2009
Policy Year: 2006

CERTIFICATE NO: BD00015727

Vessel: PUSRI INDONESIA

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

To release the vessel from further call
US\$ 25,432.27 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,358.07

Total Mutual Premium

US\$ 6,358.07

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STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42907/AU

Date Issued: 05-Feb-2009

Policy Year: 2006

CERTIFICATE NO: BD00015728

Vessel: JOELIANTO MOELJODIHARDJO

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 30-Apr-2006

To release the vessel from further call
7,645 gt x 3.463 x 69/365
x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 1,221.74

Total Mutual Premium

US\$ 1,221.74

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STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42909/AU

Date Issued: 05-Feb-2009
Policy Year: 2006

CERTIFICATE NO: BD00015729

Vessel: MOCHTAR PRABU MANGKUNEGARA

Class 1 P&I
Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

To release the vessel from further call
US\$ 25,979.43 x 25%

Amount(s) due on

05-Feb-2009 Release.Calls

US\$ 6,494.86

Total Mutual Premium

US\$ 6,494.86

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STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42911/AU

Date Issued: 05-Feb-2009

Policy Year: 2006

CERTIFICATE NO: BD00015730

Vessel: ABUSAMAH

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

To release the vessel from further call

US\$ 25,851.30 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,462.83

Total Mutual Premium

US\$ 6,462.83

**ALL OUTSTANDING INSTALMENTS ARE NOW DUE
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Please arrange settlement to:

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Telephone: +44 20 7247 5490



STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42913/AU
Date Issued: 05-Feb-2009
Policy Year: 2006

CERTIFICATE NO: BD00016164

Vessel: JOELIANTO MOELJODIHARDJO

Class 1 P&I
Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 27-Jun-2006 To N. 20-Feb-2007

To release the vessel from further call
7,465 gt x 3.463 x 238/365
x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 4,214.12

Total Mutual Premium

US\$ 4,214.12

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STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42915/AU

Date Issued: 05-Feb-2009

Policy Year: 2007

CERTIFICATE NO: BD00020888

Vessel: JOELIANTO MOELJODIHARDJO

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2007 To N. 20-Feb-2008

To release vessel from further call
US\$ 27,142.74 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,785.69

Total Mutual Premium

US\$ 6,785.69

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STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42917/AU

Date Issued: 05-Feb-2009

Policy Year: 2007

CERTIFICATE NO: BD00020889

Vessel: SULTAN MAHMUD BADARUDDIN II

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2007 To N. 20-Feb-2008

To release the vessel from further call

US\$ 25,204.75 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,301.19

Total Mutual Premium

US\$ 6,301.19

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Account Number: 8900111550, SWIFT Address: IRVTUS3N, CHIPS UID: 001, ABA: 021000018

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Under advice to the Managers' London Representative:

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STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42919/AU

Date Issued: 05-Feb-2009
Policy Year: 2007

CERTIFICATE NO: BD00020890

Vessel: OTONG KOSASIH

Class 1 P&I
Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2007 To N. 20-Feb-2008

To release vessel from further call
US\$ 26,702.78 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,675.70

Total Mutual Premium

US\$ 6,675.70

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INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42921/AU

Date Issued: 05-Feb-2009

Policy Year: 2007

CERTIFICATE NO: BD00020891

Vessel: IBRAHIM ZAHIER

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2007 To N. 20-Feb-2008

To release vessel from further call
US\$ 26,702.78 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,675.70

Total Mutual Premium

US\$ 6,675.70

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THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION (BERMUDA) LIMITED
Authorised and regulated by the Bermuda Monetary Authority and the United Kingdom Financial Services Authority
Account Number: 8900111550, SWIFT Address: IRTVUS3N, CHIPS UID: 001, ABA: 021000018
The Bank of New York Mellon, One Wall Street, NYC, NY10286
Under advice to the Managers' London Representative:
Steamship Insurance Management Services Limited, Aquatical House, 39 Bell Lane, London, E1 7LU
Telephone: +44 20 7247 5490



STEAMSHIP MUTUAL

INVOICE

For the account of :-
PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42923/AU
Date Issued: 05-Feb-2009
Policy Year: 2007

CERTIFICATE NO: BD00020892

Vessel: SOEMANTRI BRODJONEGORO

Class 1 P&I
Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium From N. 20-Feb-2007 To N. 20-Feb-2008
To release vessel from further call
US\$ 26,702.78 x 25%

Amount(s) due on
05-Feb-2009 Release Calls

US\$ 6,675.70

Total Mutual Premium

US\$ 6,675.70

**ALL OUTSTANDING INSTALMENTS ARE NOW DUE
IMMEDIATELY IN ACCORDANCE WITH THE RULES
OF THE ASSOCIATION.**

Please arrange settlement to:
THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION (BERMUDA) LIMITED
Authorised and regulated by the Bermuda Monetary Authority and the United Kingdom Financial Services Authority
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STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42925/AU

Date Issued: 05-Feb-2009

Policy Year: 2007

CERTIFICATE NO: BD00020893

Vessel: PUSRI INDONESIA

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2007 To N. 20-Feb-2008

To release vessel from further call
US\$ 26,702.78 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,675.70

Total Mutual Premium

US\$ 6,675.70

**ALL OUTSTANDING INSTALMENTS ARE NOW DUE
IMMEDIATELY IN ACCORDANCE WITH THE RULES
OF THE ASSOCIATION.**

Please arrange settlement to:

THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION (BERMUDA) LIMITED

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STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42927/AU

Date Issued: 05-Feb-2009

Policy Year: 2007

CERTIFICATE NO: BD00020894

Vessel: MOCHTAR PRABU MANGKUNEGARA

Class 1 P&I

Std P&I ex Cargo,Crew,Collision 1/4th,F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2007 To N. 20-Feb-2008

to release vessel from further call

US\$ 27,277.27 x 25%

Amount(s) due on

05-Feb-2009 Release Calls

US\$ 6,819.32

Total Mutual Premium

US\$ 6,819.32

**ALL OUTSTANDING INSTALMENTS ARE NOW DUE
IMMEDIATELY IN ACCORDANCE WITH THE RULES
OF THE ASSOCIATION.**

Please arrange settlement to:

THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION (BERMUDA) LIMITED

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Account Number: 8900111550, SWIFT Address: IRVTUS3N, CHIPS UID: 001, ABA: 021000018

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Under advice to the Managers' London Representative:

Steamship Insurance Management Services Limited, Aquatical House, 39 Bell Lane, London, E1 7LU

Telephone: +44 20 7247 5490



STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya
c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42898/AU

Date Issued: 05-Feb-2009
Policy Year: 2006

CERTIFICATE NO: BD00015721

Vessel: SULTAN MAHMUD BADARUDDIN II

Class 1 P&I
Std P&I ex Cargo, Crew, Collision 1/4th, F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

US\$ 24,005.52 x 12.5% additional call

Amount(s) due on

20-May-2009 Single Payment

US\$ 3,000.69

Total Mutual Premium

US\$ 3,000.69

Please arrange settlement to:
THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION (BERMUDA) LIMITED
Authorised and regulated by the Bermuda Monetary Authority and the United Kingdom Financial Services Authority
Account Number: 8900111550, SWIFT Address: IRVTUS3N, CHIPS UID: 001, ABA: 021000018
The Bank of New York Mellon, One Wall Street, NYC, NY10286
Under advice to the Managers' London Representative:
Steamship Insurance Management Services Limited, Aquatical House, 39 Bell Lane, London, E1 7LU
Telephone: +44 20 7247 5490



STEAMSHIP MUTUAL

INVOICE

For the account of :-

PT Pupuk Sriwijaya

c/o: Cooper Gay (HK) Ltd

Account No: 36319

Note No: BD/42912/AU

Date Issued: 05-Feb-2009

Policy Year: 2006

CERTIFICATE NO: BD00015730

Vessel: ABUSAMAH

Class 1 P&I

Std P&I ex Cargo, Crew, Collision 1/4th, F&FO inc Excess F&FO

Mutual Premium

From N. 20-Feb-2006 To N. 20-Feb-2007

Additional Call

US\$ 25,851.30 x 12.5%

Amount(s) due on

20-May-2009 Single Payment

US\$ 3,231.41

Total Mutual Premium

US\$ 3,231.41

Please arrange settlement to:

THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION (BERMUDA) LIMITED

Authorised and regulated by the Bermuda Monetary Authority and the United Kingdom Financial Services Authority

Account Number: 8900111550, SWIFT Address: IRVTUS3N, CHIPS UID: 001, ABA: 021000018

The Bank of New York Mellon, One Wall Street, NYC, NY10286

Under advice to the Managers' London Representative:

Steamship Insurance Management Services Limited, Aquatical House, 39 Bell Lane, London, E1 7LU

Telephone: +44 20 7247 5490

EXHIBIT 2



STEAMSHIP MUTUAL

STATEMENT

PT PUPUK SRIWIJAYA
c/o COOPER GAY (HK) LTD
3509 THE CENTER, 99 QUEEN'S ROAD CENTRAL
HONG KONG
HONG KONG
INDONESIA

Syndicate Accountant: D.O'LEARY
Tel: +44 (20) 7650 6487
Fax: +44 (20) 7426 8458
Email: david.o'leary@simsf.com

Statement Date: 20 AUG 2009

Account Number: 36319

Page 1 of 2

Date	Reference	Item Description	Vessel	Debit	Credit	Balance
05/02/09	2006042897-01	P and I RELEASE CALL	SULTAN MAHMUD BADARUDDIN I	6,001.38		6,001.38
05/02/09	2006042899-01	P and I RELEASE CALL	OTONG KOSASIH	6,358.07		12,359.45
05/02/09	2006042901-01	P and I RELEASE CALL	IBRAHIM ZAHIER	6,358.07		18,717.52
05/02/09	2006042903-01	P and I RELEASE CALL	SOEMANTRI BRODJONEGORO	6,358.07		25,075.59
05/02/09	2006042905-01	P and I RELEASE CALL	PUSRI INDONESIA	6,358.07		31,433.66
05/02/09	2006042907-01	P and I RELEASE CALL	JOELIANTO MOELJODIHARDJO	1,221.74		32,655.40
05/02/09	2006042909-01	P and I RELEASE CALL	MOCHTAR PRABU MANGKUNEGAF	6,494.86		39,150.26
05/02/09	2006042911-01	P and I RELEASE CALL	ABUSAMAH	6,462.83		45,613.09
05/02/09	2006042913-01	P and I RELEASE CALL	JOELIANTO MOELJODIHARDJO	4,214.12		49,827.21
05/02/09	2007042915-01	P and I RELEASE CALL	JOELIANTO MOELJODIHARDJO	6,785.69		56,612.90
05/02/09	2007042917-01	P and I RELEASE CALL	SULTAN MAHMUD BADARUDDIN I	6,301.19		62,914.09
05/02/09	2007042919-01	P and I RELEASE CALL	OTONG KOSASIH	6,675.70		69,589.79
05/02/09	2007042921-01	P and I RELEASE CALL	IBRAHIM ZAHIER	6,675.70		76,265.49
05/02/09	2007042923-01	P and I RELEASE CALL	SOEMANTRI BRODJONEGORO	6,675.70		82,941.19
05/02/09	2007042925-01	P and I RELEASE CALL	PUSRI INDONESIA	6,675.70		89,616.89
05/02/09	2007042927-01	P and I RELEASE CALL	MOCHTAR PRABU MANGKUNEGAF	6,819.32		96,436.21
05/02/09	2007042929-01	P and I RELEASE CALL	ABUSAMAH	6,785.69		103,221.90
20/05/09	2006042898-01	P and I ADDITIONAL PREMIUM	SULTAN MAHMUD BADARUDDIN I	3,000.69		106,222.59
20/05/09	2006042900-01	P and I ADDITIONAL PREMIUM	OTONG KOSASIH	3,179.03		109,401.62
20/05/09	2006042902-01	P and I ADDITIONAL PREMIUM	IBRAHIM ZAHIER	3,179.03		112,580.65
20/05/09	2006042904-01	P and I ADDITIONAL PREMIUM	SOEMANTRI BRODJONEGORO	3,179.03		115,759.68
20/05/09	2006042906-01	P and I ADDITIONAL PREMIUM	PUSRI INDONESIA	3,179.03		118,938.71
20/05/09	2006042908-01	P and I ADDITIONAL PREMIUM	JOELIANTO MOELJODIHARDJO	610.87		119,549.58
Balance carried forward:					USD	119,549.58



STEAMSHIP MUTUAL

STATEMENT

PT PUPUK SRIWIJAYA
c/o COOPER GAY (HK) LTD
3509 THE CENTER, 99 QUEEN'S ROAD CENTRAL
HONG KONG
HONG KONG
INDONESIA

Syndicate Accountant: D.O'LEARY
Tel: +44 (20) 7650 6487
Fax: +44 (20) 7426 8458
Email: david.o'leary@simsl.com

Statement Date: 20 AUG 2009

Account Number: 36319

Page 2 of 2

Date	Reference	Item Description	Vessel	Debit	Credit	Balance
		Balance brought forward				119,549.58
20/05/09	2006042910-01	P and I ADDITIONAL PREMIUM	MOCHTAR PRABU MANGKUNEGAF	3,247.43		122,797.01
20/05/09	2006042912-01	P and I ADDITIONAL PREMIUM	ABUSAMAH	3,231.41		126,028.42
20/05/09	2006042914-01	P and I ADDITIONAL PREMIUM	JOELIANTO MOELJODIHARDJO	2,107.06		128,135.48
20/08/09	2007042916-01	P and I ADDITIONAL PREMIUM	JOELIANTO MOELJODIHARDJO	1,899.99		130,035.47
20/08/09	2007042918-01	P and I ADDITIONAL PREMIUM	SULTAN MAHMUD BADARUDDIN I	1,764.34		131,799.81
20/08/09	2007042920-01	P and I ADDITIONAL PREMIUM	OTONG KOSASIH	1,869.20		133,669.01
20/08/09	2007042922-01	P and I ADDITIONAL PREMIUM	IBRAHIM ZAHIER	1,869.20		135,538.21
20/08/09	2007042924-01	P and I ADDITIONAL PREMIUM	SOEMANTRI BRODJONEGORO	1,869.20		137,407.41
20/08/09	2007042926-01	P and I ADDITIONAL PREMIUM	PUSRI INDONESIA	1,869.20		139,276.61
20/08/09	2007042928-01	P and I ADDITIONAL PREMIUM	MOCHTAR PRABU MANGKUNEGAF	1,909.41		141,186.02
20/08/09	2007042930-01	P and I ADDITIONAL PREMIUM	ABUSAMAH	1,899.99		143,086.01
Balance due to/(from)Steamship Mutual:						USD 143,086.01

Please arrange settlement to :

THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION
(BERMUDA) LIMITED

Bank Of New York Mellon, One Wall Street, New York, NY10286

Account Number: 8900111550

SWIFT Address: IRVTUS3N

CHIPS UID: 001(New York Clearing House)

ABA: 021000018(ABA Transit No)

Under advice to : D.O'LEARY

EXHIBIT 3



STEAMSHIP MUTUAL

STATEMENT

PT PUPUK SRIWIJAYA
c/o SWINGLEHURST LTD
UNITED KINGDOM

Syndicate Accountant: D.O'LEARY
Tel: +44 (20) 7650 6487
Fax: +44 (20) 7426 8458
Email: david.o'leary@sims.com

Statement Date: 20 AUG 2009

Account Number: 36223

Date	Reference	Item Description	Vessel	Debit	Credit	Balance
01/02/09	2005042800-01	P and I RELEASE CALL	JOELIANTO MOELJODIHARDJO	6,154.89		6,154.89
01/02/09	2005042801-01	P and I RELEASE CALL	MOCHTAR PRABU MANGKUNEGAR	6,185.40		12,340.29
01/02/09	2005042802-01	P and I RELEASE CALL	OTONG KOSASIH	6,055.13		18,395.42
01/02/09	2005042803-01	P and I RELEASE CALL	SULTAN MAHMUD BADARUDDIN I	5,715.44		24,110.86
01/02/09	2005042804-01	P and I RELEASE CALL	IBRAHIM ZAHIER	6,055.13		30,165.99
01/02/09	2005042805-01	P and I RELEASE CALL	ABUSAMAH	6,154.89		36,320.88
01/02/09	2005042806-01	P and I RELEASE CALL	SOEMANTRI BRODJONEGORO	6,055.13		42,376.01
01/02/09	2005042807-01	P and I RELEASE CALL	PUSRI INDONESIA	6,055.13		48,431.14
Balance due to/(from)Steamship Mutual:				USD		48,431.14

Please arrange settlement to :

THE STEAMSHIP MUTUAL UNDERWRITING ASSOCIATION
(BERMUDA) LIMITED

Bank Of New York Mellon, One Wall Street, New York, NY10286

Account Number: 8900111550

SWIFT Address: IRVTUS3N

Under advice to : D.O'LEARY

CHIPS UID: 001(New York Clearing House)

ABA: 021000018(ABA Transit No)